Coca-Cola
Hellenic Bottling Company

Anti-Bribery Policy

Coca-Cola
Hellenic Bottling Company

Table of Contents

Scope of this Policy/Administration/Seeking Guidance ____ page 1

Financial Records and Documentation ____ page 2

We Never Engage in Bribery! ____ page 2

No Retaliation ____ page 3

What Is Bribery? ____ page 3

Bribery in Relation to Public Officials ____ page 4

Who Is a 'Public Official'? ____ page 4

What Is Bribery of a Public Official? ____ page 5

Offering or Receiving Gifts and Entertainment ____ page 10

Tours of our Facilities and Demonstrations of our Products; Hospitality, Travel and Accommodation ____ page 12

Premium Events ____ page 13

Lobbying ____ page 13

Charitable Contributions ____ page 14

Political Contributions ____ page 15

Hiring Third Parties – General ____ page 15

Hiring Third Parties who Interact with Public Officials – Prior Due Diligence and Approval ____ page 16

Hiring Third Parties who Interact with Public Officials – Contracting and Monitoring the Relationship ____ page 17

Reporting Violations ____ page 18

Chief Executive Officer's Letter

Dear Fellow Team Member:

Our success depends on the prosperity of our communities. Corruption is one of the biggest threats to such prosperity. We have a role to play and a very clear position on this matter: we have zero tolerance towards any form of bribery and corruption!

I know that we operate in some difficult markets where businesses sometimes may choose to participate in corrupt practices. This is not our choice, and it can never be an excuse for our behaviour.

This Anti-Bribery Policy has been approved by the Operating Committee and also by the Board which, in conjunction with the Audit and Risk Committee, has overall responsibility for its enforcement. The anti-bribery rules are already part of our Code of Business Conduct. The reason for this specific Policy is to provide you with more detailed, practical advice to help you detect and prevent bribery and corruption that could be associated with Coca-Cola HBC. It is particularly important that those of you dealing with public officials on a regular basis read this guidance extremely carefully.

I would like to reassure you that you are not alone in dealing with the challenges described in this Policy. Corruption and bribery issues can be complex and stressful. You should always feel free to seek the support of your manager and the advice of your Ethics and Compliance Officer on any questions or concerns.

We all want to feel proud of the communities we live in and the place where we go to work every day. Integrity is one of our core values and one that we must practise and promote in everything we do. Thank you for joining me in this effort.

Sincerely,

Zoran Bogdanovic
Chief Executive Officer

Scope of this Policy/ Administration/Seeking Guidance

All employees, managers, Operating Committee members and Directors of Coca-Cola HBC and its worldwide wholly- or majority-owned or -controlled subsidiaries (together, the 'Company') must refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile or location. Every joint venture which the Company controls must adopt a similar anti-bribery policy. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Policy in our joint venture.

Applicable anti-bribery laws also prohibit corrupt payments made by any third parties acting on behalf of the Company, including suppliers, distributors, agents, consultants and contractors. This includes subcontractors or consultants hired by third parties to do work on behalf of the Company. Our suppliers, distributors, agents, consultants and contractors are also subject to many of the principles of this Policy through our **Supplier Guiding Principles.**

If you have a question or concern, there are colleagues, our **Ethics and Compliance Officers**, available to offer you guidance. Any request for approval or notification must be submitted to them through the COBC Portal (available online at www.coca-colahellenic.ethicspoint.com). The Ethics and Compliance Officer whom you should contact depends on your role:

- Country Employees: Country Legal Manager
- General Managers and Group Function Employees: Chief Compliance Officer
- Board and Operating Committee Members: General Counsel

You may always also seek guidance from your line manager.

It is imperative that you attend the mandatory training programmes arranged by the Company to ensure that you understand all applicable anti-bribery and anti-corruption laws and act in compliance with those laws.

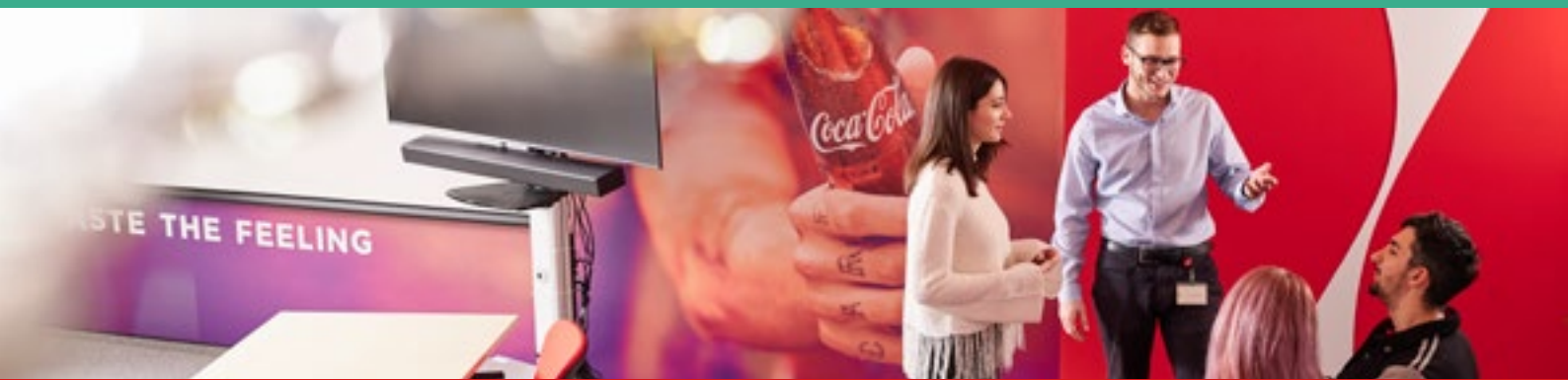
Financial Records and Documentation

All payments and expenses related to providing or receiving anything of value according to the rules of this Policy must be fully and accurately recorded in the **Anti-Bribery General Ledger Accounts**, in accordance with applicable accounting rules. You can also find an explanation of how these rules apply to gifts and entertainment in your local **Gifts and Entertainments Policy**.

We Never Engage in Bribery!

The Company applies a policy of zero tolerance to bribery, corruption or violations of this Policy.

Bribery and corruption are prohibited by law. Virtually all jurisdictions prohibit bribery of local government officials; many jurisdictions prohibit bribery of foreign public sector officials, and private sector or 'commercial' bribery, also known as 'kickbacks'. This Policy requires compliance with all such laws. Bribery and corruption may result in important legal and reputational risks for our Company and for individuals, including substantial fines and possible imprisonment. Violation of this Policy or failing to disclose violations of this Policy which you are aware of, or should have been aware of, will result in disciplinary proceedings (including up to termination of employment) and may be reported to law enforcement authorities, who may commence criminal proceedings against you.



No Retaliation

There will be strict non-retaliation by the Company for avoiding bribery and corruption and complying with this Policy. No employee will ever be penalised, through performance reviews, compensation or any other method, for refusing to pay bribes or for reporting concerns about possible bribery or corruption involving the Company. Similarly, business performance will not be judged adversely for delays or financial losses as a result of your refusal to pay a bribe.

What Is Bribery?

'Bribery' is the act of **directly or indirectly giving, offering, promising or authorising the provision of anything of value**, including any advantage, to someone in order to induce the receiving person or someone else to perform a function or activity or exercise discretion improperly.

Example
An employee provides a customer's executive and his family with a lavish weekend trip in order to influence the customer to favour the Company in a competitive sales process.

'Bribery' also includes the act of **directly or indirectly requesting, agreeing to receive or accepting anything of value**, including any advantage, that induces you or someone else to perform a relevant function or activity or exercise discretion improperly.

Example
Accepting an internship for one of your close relatives from a customer that you negotiate with on behalf of the Company.

A bribe **can be 'anything of value'** and can include money, loans, contributions or donations, gifts, entertainment, travel, offers of employment, refunds, rebates, free products, other goods, services or anything else that could be considered to have value.

Example
One of our catering suppliers offers free catering to our facilities manager for her private birthday party.

A bribe can also take the form of a 'reward' and be paid after the recipient has improperly performed her duty or obligation.

Example
Offering a public official a set of expensive football tickets after she gave a permit for our premises.

Bribery in Relation to Public Officials

Although you must never offer bribes to anyone or accept bribes from anyone, you need to be particularly vigilant not to engage in any bribery or improper dealings with Public Officials (as defined below). To avoid any potential issues, our rules of what can be considered a bribe to a Public Official are sometimes much stricter than for private parties. For example, our Gifts and Entertainment Policy sometimes contains stricter rules for interactions with Public Officials compared to those for dealings with Business Partners (as defined below). In addition, in some countries, local laws restrict the ability of Public Officials to receive anything from third parties, even if it is of symbolic value. You should never offer or provide anything to a person if doing so would violate local law, even if the conduct would otherwise not violate this policy.

Who Is a 'Public Official'?

The definition of 'Public Official' in anti-bribery laws is very broad.
'Public Officials', whether appointed or elected, can include the following persons:

- public officeholders at the national, state, provincial or municipal level, including members of legislative bodies, executive office holders, members of administrative bodies and members of the judiciary whether appointed or elected;

- employees or representatives of any government, government-owned, or government-controlled entity anywhere in the world, including both high- and low-ranking employees. 'Government-owned or -controlled entities' include, but are not limited to: central banks; sovereign wealth funds; state-run hospitals, universities or airlines; charitable enterprises; and any other business venture that is owned or controlled by a government entity. 'Government control' can be exercised in many ways and is not restricted to situations where the government is the majority shareholder;

- individuals who exercise a public function for a foreign country, territory, public agency or public enterprise, whether appointed or elected;
- officials and employees of political parties; any candidate for political office; government employees, including employees of ministries, government agencies, administrative tribunals and public boards;
- officials, employees, individuals, and agents working for, or on behalf of, public international organisations such as the World Bank, United Nations, International Monetary Fund, European Union, etc.;
- members of a royal family; and
- any child, spouse, parent, sibling or other familial relation or any individuals acting in official capacity or on behalf of any of the above.

When in doubt, you should consult with your Ethics and Compliance Officer.

What Is Bribery of a Public Official?

It is **bribery** to give or offer anything of value or any advantage to or for the benefit of a Public Official to **influence his or her discretionary decision**, such as the outcome of a government audit or inspection or a decision to award or continue business relations, or to impose a fine.

Example

Paying a police officer a sum of money to not give you a traffic ticket and remove the plates of our Company truck for a traffic violation.

We are not allowed to make small payments, sometimes known as 'grease payments', or give any other advantage to Public Officials **to obtain a permit, licence or other necessary approval**.

Example

When you seek to build or expand a facility or obtain operating permits (for example, for water extraction), you should follow the official procedure and must not make any payment, however small, to a local public official to obtain the permit or to accelerate his or her review.

We are also not allowed to make 'facilitating payments' i.e. small payments to Public Officials to expedite or facilitate non-discretionary actions or services, such as obtaining ordinary licences or business permits or processing government papers such as visas and customs clearance. The fact that Public Officials do not have discretion and are required by law to take these actions or provide such services is not an excuse for making payments or giving any other advantage so that they **speed up such processes.**

Example

Offering a customs officer cash or free products to accelerate customs clearance of our products.

Also make sure that you follow all the **local requirements** when we enter into contracts with Public Officials, and get advice from your Ethics and Compliance Officer if you have any doubts.

Example

Hiring policemen as security staff is legally possible in some countries but requires proper formalities and procedures. For example, if you are hiring a policeman for plant security, you might need to register this arrangement with the ministry of public order beforehand and contract with the policeman's employer.

Please be aware that behaviour where someone tries to **influence Public Officials in an indirect way** might also be considered as a bribe. Appearances matter. Do not offer, promise, give or authorise giving anything of value or any advantage to anyone if the circumstances may give **the appearance** of seeking to influence the Public Official. In those situations, seek advice from your Ethics and Compliance Officer.

Example

Do not donate to a charity event sponsored by a public official to help his political promotion in exchange for a favourable decision from his administration in connection with a pending audit of our operations.

Which Areas of our Business Activity Require Particular Attention?

You should be particularly careful and not make payments, or give any other advantage, to a Public Official in connection with the following situations:

When you seek to obtain or expedite necessary official approvals, permits or licences.

Example

We are unable to obtain final approval for a building permit even though we have submitted all legally required documentation. A ministry employee requests an additional fee that is not provided in the law in order to secure final approval. You should refuse and escalate immediately with your Ethics and Compliance Officer;

In dealing with inspections and fines, for example, in order to avoid an inspection, influence the findings of an inspection, or avoid a fine.

Example

A public health inspector has arrived at a Company manufacturing plant. You should not promise or offer her anything of value or any advantage, e.g. free product, **without the prior written approval** of your Ethics and Compliance Officer;

in dealing with customs authorities, in order to ensure that goods are cleared through the customs process or to ensure that goods are cleared in a timely manner. Be cautious if a customs official asks if you would like a 'fast-track' process, as this could be another way of asking for a bribe.

Example

Even though you are convinced that everything is in order, a customs officer claims that some key information is missing to complete customs clearance for a shipment of perishable strawberry juice and that he can make an exception for an extra USD150 and promptly release the shipment. Otherwise, the juice will spoil. In these circumstances, you should politely refuse to pay to expedite the customs clearance and note that it is against Company policy to make such payments. Consult your Ethics and Compliance Officer on next steps; or

to obtain work permits, visas and registration, for yourself or another Company employee. It is often useful to contact the local embassy of the employee who is trying to obtain the visa. Sometimes the embassy can help. You should be wary of requests for a 'surcharge' to issue visas for Company employees or their families, which can be a mean for extracting a bribe.

Example

A newly appointed expatriate General Manager is unable to transfer his family to his new host country without a work permit. The local immigration authorities refuse to issue such permit unless an unofficial employment 'surcharge' is paid. Even if the delay causes significant difficulties, you should politely explain that Company policy does not permit the payment of such surcharges, and immediately report the incident to and discuss next steps with your Ethics and Compliance Officer.

What to Do if a Public Official Requests a Bribe or is Suspected of Doing So?

You may encounter a Public Official requesting a bribe, or even threatening you that he will delay his decision or decide against the interests of the Company if you do not comply with such request.

In order to avoid or effectively manage such situations, do the following:

- know the local rules and regulations as well as timelines that must be considered when: obtaining any kind of approval, permit or licence to clearing customs, obtaining a work permit, visa or registration or conducting other proceedings. Prepare the relevant documents as required and plan enough time to comfortably conduct these proceedings in the normal way

- state clearly and immediately that you cannot and will not pay bribes as a way of doing business;

- make sure you have a good understanding of the structure of the relevant regulatory body so that if necessary you are ready to appeal to a more senior public official to solve the problem or identify alternative offices that don't request bribes;
- work with the local chamber of commerce and engage other departments and colleagues within our organisation to discuss solutions if issues occur;
- ask others to accompany you – the presence of others may discourage the official from requesting a bribe;
- pay only those taxes, fees, fines or other charges required by applicable local laws, or those approved by your Ethics and Compliance Officer, and pay all such taxes and charges directly to the authorised service of the relevant governmental or other agencies rather than to any individual Public Official;
- be wary of working with third-party service providers who state that they can solve customs issues using their relationship with the authorities; Coca-Cola HBC's Anti-Bribery Policy does not allow bribes to be paid to Public Officials through third parties acting for the Company, whether directly or indirectly);
- when hiring an employee, ask the candidate if he/she is or has been a Public Official, or is related to anybody who is a Public Official; if the answer is positive, before hiring the candidate you need to **obtain the prior written approval of your Ethics and Compliance Officer;** and
- seek guidance and help where necessary.

If a threat is made which puts an employee's personal safety at risk (for example, if the Public Official is armed and threatening, or if a payment must be made immediately to ensure safe passage out of a particular situation or location), the payment should be made without prior approval, and you should report the payment to your Ethics and Compliance Officer as soon as practicable. Any payment required in this circumstance should be correctly recorded in the Company's books and records.

Offering or Receiving Gifts and Entertainment

This section informs you about the dos and don'ts related to offering and receiving gifts and entertainment. It applies equally to dealings with customers, distributors, suppliers, consultants, contractors, agents and representatives, other business partners ('Business Partners') and Public Officials.

This is the most commonly encountered part of our Anti-Bribery programme in our daily professional lives. In many instances it is entirely legitimate to give and accept modest and appropriate gifts and entertainment. We have introduced in each country a **Gifts and Entertainments Policy (including free products and meals)**. That policy clarifies when you can proceed without legal approval and when, due to the monetary value of the proposed gift or entertainment or other circumstances, either you need prior approval from your Ethics and Compliance Officer, or it is simply impossible to proceed.

Example

The head of the local tax authority where the Company is registered as a taxpayer requests free Company beverages for his son's birthday party. You should politely explain that you are not permitted to provide Company products to him pursuant to Company policy, and promptly report the request to your Ethics and Compliance Officer.

Even if they are permitted, gifts and entertainment still require appropriate accounting documentation and must be recorded accurately in the Company's **Anti-Bribery General Ledger Accounts** in accordance with applicable accounting rules.

There are certain rules and guidelines that apply in all circumstances:

never give cash gifts to, nor take cash gifts from, anyone – whether directly or indirectly. The same applies to gifts which are equivalent to cash, including gift cards;

never agree to a daily allowance for expenses – the actual expenses would need to be reviewed and if applicable paid or reimbursed (as otherwise you are making a cash gift);

meals, gifts or entertainment, as well as travel and accommodation expenses, should not be excessive and should be reasonable in the circumstances. If you have any doubts as to whether a meal, gift or entertainment is excessive, always consult your Ethics and Compliance Officer.

Example
After the scheduled opening of the Company's new water production plant, the plant manager may not take the Public Official and his associates to the nicest restaurant in the city, even if it is not unusual for other companies to do so;

the activity should be associated with a valid business purpose. Generally, there should always be an employee present at the meal or entertainment event.

Example
A general manager may not provide a Business Partner with tickets for a football match if there is no legitimate business purpose and, in fact, he does not plan to attend or require another employee to do so;

Public Officials should not be invited to premium events (e.g. the Olympic Games or other athletic or cultural events);

never offer hospitality or entertainment to, or accept it from, a person who is able to influence a pending or ongoing matter involving the Company (for example, if they are able to approve an application, conduct an inspection, or influence contract negotiations, tenders or supplier selection processes). The same applies in any circumstance involving, or giving the appearance of involving, an arrangement under which the courtesy is offered in exchange for some benefit to the Company;

always be sensitive to our Business Partners' and Public Officials' own rules on receiving gifts and entertainment. Do not offer gifts or entertainment that you know their policy does not allow. Also, if you are dealing with Public Officials, become familiar with local legislation regulating the behaviour of Public Officials. Your Ethics and Compliance Officer will be able to advise you on such legal requirements.

Example
Many customers and suppliers prohibit their employees from joint meals during the annual negotiation process;

never ask for gifts or invitations.

> Example
> Asking a supplier sponsoring a popular sports event to find tickets for you and your spouse; and

if you are offered something that exceeds the guidelines in the local Gifts and Entertainment Policy, politely decline and explain the Company's rules. If the circumstances under which the gift was given prevent its return or make it practically very difficult, you should notify your Ethics and Compliance Officer. In certain cases, instead of returning the gift it will be acceptable to either donate the item to charity or distribute it among a larger group of employees.

> Example
> If a key account manager receives three bottles of champagne from her customer she can distribute, after consultation with the Ethics and Compliance Officer, these bottles outside her team among colleagues who do not have a working relationship with that customer.

Tours of our Facilities and Demonstrations of our Products; Hospitality, Travel and Accommodation

Employees may invite Public Officials or Business Partners to Company facilities for tours or product demonstrations. Similarly, employees may invite Public Officials or Business Partners for hospitality and provide reasonable travel and accommodation for legitimate business purposes. Employees may also receive invitations from our Business Partners for similar events.

You may pay or be reimbursed for **reasonable and bona fide expenditures**, such as meal expenses incurred by or for a Public Official or a Business Partner on a business-related visit, provided that all general requirements (including, for any gifts or meals, **prior approval** and appropriate documentation under your local Gifts and Entertainment Policy) are met and provided also that:

such activities involve, and such expenses are directly related to, legitimate business purposes such as promoting, demonstrating or explaining Company products, or conducting tours of Company facilities;

payment by businesses for such expenses is widely accepted, customarily practised and permissible under local laws and our local **Gifts and Entertainments Policy;**

- you do not agree to keep the event or its reimbursement confidential from the employer of the visiting individual or Public Official;

- the travel and accommodation costs are paid by the Company only, and directly to the third-party travel and accommodation providers. When payment directly to such third-party providers is not possible, payment may be made to the individual's or Public Official's employer but may never be made directly to the individual or Public Official; and

- even if you can pay or be reimbursed for such expenditures, the Company will never pay cash to employees to cover these expenditures, and you should never receive cash either in compensation for your expenditures.

Premium Events

The local Gifts and Entertainments Policy applies for all events. However, in some cases, there are special rules for premium events (e.g. the Olympic Games or other athletic or cultural events). Please consider such specific guidance when it is applicable. Your Ethics and Compliance Officer will be able to direct you to the relevant policy and advise you on how to apply it to your circumstances. You should exercise similar caution and discuss with your Ethics and Compliance Officer if you are invited to a premium event by a Business Partner. As noted above, Public Officials should not be invited to premium events and their participation, travel and accommodation costs for such events must always be borne by their employer.

Lobbying

You must obtain **prior written approval** from your Ethics and Compliance Officer before entering into any lobbying arrangement. Your Ethics and Compliance Officer will support you to ensure that we meet the requirements of any lobbying-related laws, regulations or policies, including local registration and reporting requirements. All lobbying arrangements must be fully documented, and include clear and detailed retention agreements, invoices from the lobbyist and documentation of the work product. Do not engage lobbyists until you have conducted third-party due diligence (see below).
We are not permitted to hire a serving Public Official or any of their relatives to carry out lobbying or political advocacy activities on behalf of the Company.

Charitable Contributions

General Managers and Operating Committee members are authorised to make charitable contributions (see our Corporate Contributions Policy). However, charitable contributions are permitted only if:

- the recipient charity is a bona fide charity that is regulated and supervised as such in the jurisdiction;
- there is no reason to believe that the charity itself may be **operated directly or indirectly for the private benefit of any Public Official;** and
- all relevant records relating to such expenditures are kept and recorded in the Anti-Bribery General Ledger Accounts.

If any Public Official is a director or officer of the charity, or is otherwise closely associated with the charity, or requests that the Company donate to the charity, you should inform your Ethics and Compliance Officer in writing. He or she, in turn, will advise you on the enquiries or other procedures that we require in order to determine with a high level of assurance whether the contribution would be permitted.

Political Contributions

It is necessary to obtain **prior written approval** from the Company's Board of Directors before authorising or making a political contribution in the Company's name. All records relating to such expenditures must be kept and recorded in the Anti-Bribery General Ledger Accounts.

Hiring Third Parties – General

The Company may be held **liable** for bribes paid by anyone acting on the Company's behalf, or bribes paid **by anyone performing services for the Company**. Therefore, we should **never authorise or ask a third party to pay or receive bribes either to a Business Partner or a Public Official**, nor should we overlook activities by third parties acting on the Company's behalf that might conflict with this Policy.

Examples of third parties

customers, distributors, suppliers, agents, representatives, consultants, other intermediaries, contractors and service providers, real estate contractors, sales and marketing firms, tax consultants, lobbyists.

You should report to your Ethics and Compliance Officer any conduct by a third party who is a candidate to perform or who is performing services for the Company (not simply buying and reselling goods, without any further involvement from the Company) that you believe is in violation of this Policy.

Example

You become aware that a consultant hired to represent the Company in obtaining a building permit for our plant is inviting Public Officials to lavish meals and entertainment and has a practice of hiring their relatives to 'build good relationships' with the regulators.

Hiring Third Parties who Interact with Public Officials – Prior Due Diligence and Approval

If you are the business owner of a contract with a third party **who may interact with Public Officials on behalf of the Company,** you will be responsible for the overall relationship with that third party – from reviewing that third party for selection until the end of its engagement. As such, you must ensure that due diligence is conducted and **prior written approval** from your Ethics and Compliance Officer is obtained before hiring the third party.

Anti-bribery due diligence for parties who may interact with Public Officials on behalf of the Company must in all cases be performed through the Exiger platform at [https://insight.exiger.com/Auth/Login], which should identify whether such party is high-risk, has had prior accusations of improper business conduct, etc. If the Exiger platform raises any red flags, you should consult your Ethics and Compliance Officer. This due diligence must be renewed biennially.

Example

The local HR department hires a company to obtain work permits. The HR owner of the relationship with the provider is ultimately responsible for running the due diligence. If he or she has any questions regarding the process or the Exiger platform, he or she should seek guidance from the Ethics and Compliance Officer.

Hiring Third Parties who Interact with Public Officials – Contracting and Monitoring the Relationship

The business owner responsible for the relationship must ensure that the contract with the intermediary clearly and specifically describes the type of service to be rendered by the intermediary, that this service is visibly rendered and that the relevant compensation is proportionate to the service performed by the intermediary in that particular location. In addition, the business relationship owner should obtain from the Ethics and Compliance Officer, for inclusion in the contract with the intermediary, provisions stating that the counterparty does not and will not engage in bribery. The Legal and Procurement departments will support you, as necessary, but it is your ultimate responsibility as the business contact to assess the behaviour of the third party that you manage and raise any concerns with your Ethics and Compliance Officer.

Attention must be paid to signs that indicate the party may be at risk of non-compliance with this Policy, such as:

- the third party requests disproportionate, success or percentage-based compensation;
- the third party requests an inappropriate method of payment (e.g. indirect payments made payable in another country, payments in cash, or payments to the account of an unrelated third party);
- the third party is unwilling to sign a contract;
- the third party has been recommended to you by a Public Official;
- the third party does not appear to have appropriate experience relevant to the task at issue;
- The third party promises unusually fast results; or
- The third party requests extra payments or gifts.

If any of the above are the case you should escalate without delay to your Ethics and Compliance Officer.

Reporting Violations

If you observe conduct that may violate this Policy or you are approached for purposes of bribery or corruption, contact your Ethics and Compliance Officer or use the Speak Up! line, which may be accessed anonymously and which is available at www.coca-colahellenic.ethicspoint.com. Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action. Any such reporting will be treated as confidential to the extent permitted by law. Failure to report a violation of this Policy constitutes an independent violation of this Policy, and of the Code of Business Conduct, which is subject to disciplinary action, up to and including termination of employment.

Suspected Policy violations of a serious nature, such as those involving high levels of management, significant sums of money, or alleged criminal activities should be reported to the General Counsel or the Chief Compliance Officer immediately.

Coca-Cola